

EXHIBIT 4

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE FOREIGN EXCHANGE
BENCHMARK RATES ANTITRUST
LITIGATION

No. 1:13-cv-07789-LGS

SUMMARY NOTICE OF CLASS ACTION SETTLEMENTS

If you entered into an FX Instrument or FX Exchange-Traded Instrument between January 1, 2003 and December 15, 2015, you may be affected by pending class action settlements.

“FX Instrument” means foreign exchange (“FX”) spot transactions, forwards, swaps, futures, options, and any other FX instrument or FX transaction the trading or settlement value of which is related in any way to foreign exchange rates. “FX Exchange-Traded Instruments” means any and all FX Instruments that were listed for trading through an exchange, including, but not limited to, FX futures and options on FX futures.

This Notice is to alert you to proposed Settlements reached with the following “Settling Defendants”:

1. Bank of America Corporation, Bank of America, N.A., and Merrill Lynch, Pierce, Fenner & Smith Incorporated (“Bank of America”);
2. The Bank of Tokyo-Mitsubishi UFJ, Ltd. (“BTMU”);
3. Barclays Bank PLC and Barclays Capital Inc. (“Barclays”);
4. BNP Paribas Group, BNP Paribas North America Inc., BNP Paribas Securities Corp., and BNP Prime Brokerage, Inc. (“BNP Paribas”);
5. Citigroup Inc., Citibank, N.A., Citicorp, and Citigroup Global Markets Inc. (“Citigroup”);
6. [Deutsche Bank AG and Deutsche Bank Securities Inc. \(“Deutsche Bank”\)](#)
7. The Goldman Sachs Group, Inc. and Goldman, Sachs & Co. (“Goldman Sachs”);
8. HSBC Holdings PLC, HSBC Bank PLC, HSBC North America Holdings Inc., HSBC Bank USA, N.A., and HSBC Securities (USA) Inc. (“HSBC”);
9. JPMorgan Chase & Co. and JPMorgan Chase Bank, N.A. (“JPMorgan”);
10. Morgan Stanley, Morgan Stanley & Co., LLC, and Morgan Stanley & Co., International PLC (“Morgan Stanley”);
11. RBC Capital Markets LLC (“RBC”);
12. The Royal Bank of Scotland Group PLC, The Royal Bank of Scotland PLC, and RBS Securities Inc. (“RBS”);
13. Société Générale (“Soc Gen”);
14. Standard Chartered Bank (“Standard Chartered”); and
15. UBS AG, UBS Group AG, and UBS Securities LLC (“UBS”).

Settling Defendants have settled a lawsuit alleging that Settling Defendants conspired to fix and manipulate prices in the FX market in violation of Sections 1 and 3 of the Sherman Antitrust Act, 15 U.S.C. §§1, 3, and in violation of the Commodity Exchange Act, 7 U.S.C. §§1, *et seq.*

Settling Defendants deny that the material allegations made against them in this Action have merit. In total, Settling Defendants have paid \$2,312,275,000 into a Settlement Fund. The litigation is continuing against Credit Suisse Group AG, Credit Suisse AG, and Credit Suisse Securities (USA) LLC (“Credit Suisse”) or “Non-Settling Defendant,” and ~~Deutsche Bank AG and Deutsche Bank Securities Inc. (“Deutsche Bank”)~~ (collectively, “Non-Settling Defendants” and, with Settling Defendants, “Defendants”). Non-Settling ~~Defendants deny~~ Defendant denies all allegations of wrongdoing.

The Court has appointed the lawyers listed below to represent the Settlement Classes in this Action:

Christopher M. Burke
Scott+Scott, Attorneys at Law, LLP
707 Broadway, Suite 1000
San Diego, CA 92101
Telephone: 619-233-4565
cburke@scott-scott.com

Michael D. Hausfeld
Hausfeld LLP
1700 K Street, NW, Suite 650
Washington, DC 20006
Telephone: 202-540-7200
mhausfeld@hausfeld.com

Who is a member of the Settlement Classes?

The Court preliminarily approved two proposed Settlement Classes in this case.

Subject to certain exceptions, the proposed “**Direct Settlement Class**” consists of all Persons who, between January 1, 2003 and December 15, 2015, entered into one or more FX Instruments directly with a Defendant, a direct or indirect parent, subsidiary, or division of a Defendant, a Released Party, or co-conspirator where such Persons were either domiciled in the United States or its territories or, if domiciled outside the United States or its territories, transacted FX Instruments in the United States or its territories.

Subject to certain exceptions, the proposed “**Exchange-Only Settlement Class**” consists of all Persons who, between January 1, 2003 and December 15, 2015, entered into one or more FX Exchange-Traded Instruments where such Persons were either domiciled in the United States or its territories or, if domiciled outside the United States or its territories, entered into an FX Exchange-Traded Instrument on a U.S. exchange.

The terms “Released Parties,” “FX Instruments,” and “FX Exchange-Traded Instruments” are defined in the detailed Notice of Class Action Settlements (“Notice”) and each of the Settlement Agreements, which are available at WWW.FXANTITRUSTSETTLEMENT.COM.

If you are not sure if you are included in one of the Settlement Classes, you can get more information, including the detailed Notice, at WWW.FXANTITRUSTSETTLEMENT.COM or by calling toll-free 1-888-582-2289 (if calling from outside the United States or Canada, call 1-330-333-7253).

Will I get a payment?

If you are a member of one of the Settlement Classes and do not opt out, you will be eligible for a payment under the settlements if you file a Proof of Claim and Release (“Claim Form”). The Settlements and Plan of Distribution have been preliminarily but not finally approved by the Court. You also may obtain a copy of the Settlements and Plan of Distribution at WWW.FXANTITRUSTSETTLEMENT.COM or by calling toll-free 1-888-582-2289 (if calling from outside the United States or Canada, call 1-330-333-7253). Claim Forms must be postmarked by ~~Month-XX~~March 22, 2018 or submitted online at WWW.FXANTITRUSTSETTLEMENT.COM on or before 11:59 p.m. Eastern time on ~~Month-XX~~March 22, 2018.

What are my rights?

If you are a member of one of the Settlement Classes and do not opt out, you will release certain legal rights against Settling Defendants and other Released Parties, as explained in the detailed Notice and Settlement Agreements, which are available at WWW.FXANTITRUSTSETTLEMENT.COM. If you do not want to take part in the proposed Settlements, you must opt out by ~~Month-XX~~February 7, 2018. You may object to the proposed Settlements, the Plan of Distribution, and/or Class Counsel’s request for attorneys’ fees or expenses. If you want to object, you must do so by ~~Month-XX~~February 7, 2018. Information on how to opt out or object is contained in the detailed Notice, which is available at WWW.FXANTITRUSTSETTLEMENT.COM.

Even if you did not transact any FX Instruments with any of the Settling Defendants, you may be a member of one of the Settlement Classes if, between January 1, 2003 and December 15, 2015, you entered into an FX Instrument with a Non-Settling Defendant or you entered an FX Exchange-Traded Instrument; such transactions are eligible for making a claim under the Settlements, provided that you are either domiciled in the United States or, if you are domiciled outside the United States, your transaction occurred in the United States. Unless you opt out of the Settlements, you will be releasing all claims against Settling Defendants and other Released Parties in connection with your trades with both Settling Defendants and Non-Settling Defendants. You will not be releasing any claims against Non-Settling Defendants.

When is the Fairness Hearing?

The Court will hold a hearing at the United States District Court for the Southern District of New York, Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, on ~~Month-XX~~May 23, 2018 at ~~—:—:—~~4:00 p.m. Eastern time to consider whether to approve the proposed Settlements, the Plan of Distribution, and Class Counsel’s request for attorneys’ fees and expenses. You or your lawyer may ask to appear and speak at the hearing at your own expense, but you do not have to.

For more information, call toll-free 1-888-582-2289 (if calling from outside the United States or Canada, call 1-330-333-7253) or visit WWW.FXANTITRUSTSETTLEMENT.COM.

****** Please do not call the Court or the Clerk of the Court for information about the settlements. ******